

## AFFIDAVIT FOR PROBABLE CAUSE

STATE OF INDIANA, COUNTY OF JOHNSON, SS:

**Detective Mark Clephane** swears that the following information is true and that he has personal knowledge of it, or learned it from another law enforcement officer.

### BACKGROUND

I am a ~~detective~~ <sup>TROOPER</sup> employed by the Indiana State Police. Kim Haskett and Charles Williams, investigators employed by Indiana Secretary of State Todd Rokita, Securities Division, Prosecution Assistance Unit and I became involved in an investigation of the defendant, **WANDA T. ROBERTSON** ("Robertson"), **W/F, D.O.B. 10/27/42, SSN XXX-XX-XXXX, IN OLN XXXX-XX-XXXX, of 1757 HANDBALL LANE APARTMENT A, INDIANAPOLIS, IN 46260**. The investigation arose from suspicion that Robertson had committed violations of the Indiana Securities Act. At the time that the offenses were committed, the defendant was a resident of Franklin, Johnson County, Indiana.

Robertson owned a company called The Real Estate Paper Chase ("Paper Chase"). TREPC was incorporated in Indiana on March 23, 2007. She advertised on [www.craigslist.com](http://www.craigslist.com), soliciting investors in a "business opportunity." She claimed to be offering an investment contract where the investor would buy a 25% ownership in Paper Chase, but without any control over the running of the business. A second part of Robertson's scheme was to use investors' credit histories to apply for credit cards and loans on behalf of the business. She told the investors that the cards and loans would be used for business expenses incurred by Paper Chase. In return, the investor would receive payment equal to 4% of the amount borrowed or charged by Paper Chase under the investor's credit. The agreement also provided that Paper Chase would repay any debts incurred under the investor's name.

### JAMES LoBOSCO

Kerri Josephic ("Josephic") introduced James LoBosco ("LoBosco") to Robertson through the internet and emails. LoBosco became interested in the investment scheme Robertson was promoting. LoBosco agreed to have Robertson apply for credit to be used for Paper Chase expenses, using LoBosco's personal information.

The second part of Robertson's plan as stated to LoBosco was to make him an officer of a shelf corporation, through which LoBosco would apply for business loans. Paper Chase would then use the loans to purchase real estate, which Robertson promoted to LoBosco as a money-making scheme. Robertson told LoBosco he would make \$1 million by the end of 2008. LoBosco signed an investment contract in February 2008 and executed a special power of attorney for Robertson on March 12, 2008.

Robertson omitted to inform LoBosco of the fact that she was not registered as a broker-dealer with the Indiana Secretary of State Securities Division, as required by law. Furthermore, she omitted to inform him of the fact that the investment contract was not registered with the Indiana Secretary of State Securities Division, as required by law.

### JASPER STATON

Jasper Staton ("Staton") became acquainted with one Jennifer Moye-Richards (Richards") through real estate dealings. Richards contacted Staton in January 2008 saying she had an investment opportunity for him. Richards introduced Staton to Robertson and explained the Paper Chase scheme to him.

Staton signed an agreement to purchase the shelf corporations and gave Robertson special power of attorney on February 29, 2008, to allow her to purchase 8 shelf corporations on Staton's behalf. Robertson told Staton that he would receive a \$200,000 return on each corporation, and that he would receive \$115,000 by April 1, 2008.

Robertson omitted to inform Staton of the fact that she was not registered as a broker-dealer with the Indiana Secretary of State Securities Division, as required by law. Furthermore, she omitted to inform him of the fact that the investment contract was not registered with the Indiana Secretary of State Securities Division, as required by law.

### **GEORGE LEWIS**

Lewis met Robertson through Josephic. Robertson said that she would pay Lewis in exchange for use of his credit for business expenses of Paper Chase. Robertson would then make him a high-level executive in a shelf corporation. Robertson told Lewis that he would never be responsible for payment of the loans that Paper Chase would take out in his name.

Lewis executed an investment contract with Paper Chase in February or March 2008. Lewis also executed a Special Power of Attorney for Robertson and Paper Chase.

Robertson omitted to inform Lewis of the fact that she was not registered as a broker-dealer with the Indiana Secretary of State Securities Division, as required by law. Furthermore, she omitted to inform him of the fact that the investment contract was not registered with the Indiana Secretary of State Securities Division, as required by law.


### **REGISTRATION**

After a duly diligent search, no record of application for registration as a broker-dealer under the name of Wanda Robertson, Wanda Warner, Wanda Lee, or The Real Estate Paper Chase is found to exist in the records of the Indiana Secretary of State's Office, Securities Division, including a search of the CRD and the IARD, nor is there any evidence that any was ever filed.

In addition, after a duly diligent search, no record of application for registration of a security in the State of Indiana under the name of Wanda Robertson, Wanda Warner, Wanda Lee, or The Real Estate Paper Chase is found to exist in the records of the Indiana Secretary of State's Office, Securities Division, nor is there any evidence that any was ever filed.

**I SWEAR (AFFIRM), UNDER THE PENALTY OF PERJURY AS SPECIFIED BY IC 35-44-2-1, THAT THE FOREGOING REPRESENTATIONS ARE TRUE.**

Affiant

 5/18

Date

2/19/09